



COMMONWEALTH of VIRGINIA  
DEPARTMENT OF ENVIRONMENTAL QUALITY

December 16, 1993

Brenda Norton, P.E.  
Code 1822  
Naval Facilities Engineering Command, Atlantic Division  
1510 Gilbert Street  
Norfolk, VA 23511-2699

RE: Draft Site Management Plan, Naval Weapons Station, Yorktown

Dear Ms. Norton:

The Department of Environmental Quality is in receipt of the following document: "Draft Site Management Plan, Naval Weapons Station, Yorktown, Virginia," dated November 23, 1993. I have reviewed the document, and have discussed my concerns during the SMP discussion meeting held on December 14, 1993 at Yorktown Naval Weapons Station. For your reference, I have attached my comments that were discussed during the meeting.

If you have any questions, please feel free to contact me at (804) 762-4205.

Sincerely,

A handwritten signature in cursive script that reads "Lisa A. Ellis".

Lisa A. Ellis  
Remedial Project Engineer  
Federal Facilities Program

cc: Rob Thomson, EPA Region III  
Erica Dameron  
K.C. Das

**Comments**  
**Draft Site Management Plan**  
**Yorktown Naval Weapons Station**

1. On page 3-3, it is stated that it should be noted that a removal action may become the final remedial action if the risk screening/assessment results indicate that further remediation is not required for protection of human health and the environment. It should also be noted, however, that in most cases a removal action is only an interim action taken to address soils contamination. Surface water and groundwater contamination, plus additional soils contamination, usually must be addressed by further remedial activity at a site. Also, it should be noted that where no further action is required at a site that has undergone removal action, a no action Record of Decision will have to be signed between the concerned parties in order to remove the site from the cleanup program.
2. It is noted on page 5-1 that some review times presented in the Site Management Plan have been shortened to expedite the project schedule. It should be noted that, where possible, these review times will be achieved. However, the FFA is a negotiated document and contains review times agreed to by all parties who ultimately sign the FFA. As such, the FFA represents a contract between the signing parties, and the time frames in the signed document are binding, not the time frames presented in the Site Management Plan. However, as stated previously, the proposed review times indicated in the SMP will be achieved where possible.
3. As discussed during the 12/14 meeting, the proposal to begin the treatability studies, where necessary, following finalization of the feasibility study is impractical. It is better to complete a treatability study prior to finalization of the FS so that it can be known whether the proposed alternative will be useful to achieve cleanup levels at a site. Alternative treatment methods can then be proposed if it is determined during the treatability study that proposed treatment methods cannot achieve desired cleanup levels.